Allowing the decision of the Court of Appeals to stand is sure to engender litigation throughout the country, wherever reservations, non-Indian communities or roads are located. Incidents involving the seizure of transports and their cargo, commercial or private, are likely to increase. See A-132. There has not been more[10] litigation to date because apparently no one anticipated the abrupt change in the law by the Court of Appeals.

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jurisdiction over "non-Indian communities" or rights-of-way. 18 Fed. Reg. 7479 (November 21, 1953).

[10] *See, Berry vs. Arapaho & Shoshone Tribes*, 420 F. Supp. 934 (D. Wyo. 1976), a case within the Ninth Circuit where the "non-Indian community" question was an issue.

CONCLUSION

For all of the reasons set forth in Petitioners' Petition for Writ of Certiorari, and this Reply Brief, Petitioners respectfully request that this Court grant the Petition for Writ of Certiorari.

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